

ADLER, COHEN, HARVEY,  
WAKEMAN & GUEKGUEZIAN  
A LIMITED LIABILITY PARTNERSHIP  
ATTORNEYS AT LAW

2006 JUN 28 A 10:40

U.S. DISTRICT COURT  
DISTRICT OF MASS.

June 28, 2006

SIDNEY W. ADLER  
ELLEN EPSTEIN COHEN  
ALEXANDRA B. HARVEY  
GEORGE E. WAKEMAN, JR.\*  
A. BERNARD GUEKGUEZIAN  
LAURA BERG SUSICH  
MICHAEL F. CONWAY  
JENNIFER BOYD HERLIHY\*  
ERIN M. BROWN  
KRISTEN L. CLARKE  
JUDITH FEINBERG  
BROOKS L. GLAHN  
JOHN R. PELLETIER  
MICHAEL B. BARKLEY  
JENNIFER A. NORTON  
E. AMY TUCCI\*

\*also admitted in RI  
\*also admitted in CT

via hand delivery

Judge Robert D. Collings  
Clerk's Office - Civil  
United States District Court  
U.S. Courthouse  
Courthouse Way  
Boston, MA 02210

Re: Jue Zhang vs. Shraga N. Goldberg, M.D.  
Civil Action Number: 04-12735PBS RBC

Dear Judge Collings:

Enclosed for your ex parte, in camera review, please find a copy of the following document: *Affidavit of Defense Counsel*. This Affidavit is being filed in accordance with the Court's ruling of June 19, 2006, in which you allowed the defendant to provide additional information via an Affidavit discussing expected expert testimony for your review in connection with determining the relevance of the defendant's Motion for Order to Obtain Documents from the Department of the United States Government (paper 27).

This enclosure is not being sent to plaintiff's counsel and I would specifically request that it not be scanned or entered on the Court's electronic docket.

Thank you for your attention to this matter.

Very truly yours,

Jennifer Boyd Herlihy

JBH/jmd  
Enclosure(s)

cc: Barry D. Lang, Esquire (WITHOUT ENCLOSURE)

JUN 29 2006 The within letter should be scanned, docketed & filed.